

U.S. Postal Service

**CERTIFIED MAIL RECEIPT**

*(Domestic Mail Only; No Insurance Coverage Provided)*



SDMS DocID

**283458**

Certified Fee

Return Receipt Fee  
(Endorsement Required)

Postmark  
Here

Restricted D  
(Endorsement)

Total Postage

**William F. McGonigle**  
**Treasurer and Vice President - Finance**  
**Samuel Cabot Incorporated**  
**100 Hale Street**  
**Newburyport, MA 01950**

Sent To

Street, Apt. 1  
or PO Box 1

City, State, ZIP

0052-0318

PS Form 3800, January 2001

Use Reverse for Instructions

9544 E659 0000 04TT 7002

### **Certified Mail Provides:**

- A receipt for the item
- A record of the date and time of delivery
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

### **Important Reminders:**

- Certified Mail may **ONLY** be combined with First-Class Mail or Priority Mail.
- Certified Mail is not available for any class of international mail.
- **NO INSURANCE COVERAGE IS PROVIDED** with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "*Return Receipt Requested*". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

William F. McGonigle  
Treasurer and Vice President - Finance  
Samuel Cabot Incorporated  
100 Hale Street  
Newburyport, MA 01950

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

8/18/05

C. Signature

X Wendy Richard

☐ Agent

☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

0052-0319

press Mail  
Return Receipt for Merchandise  
O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

7001 1140 0000 6593 4458

UNITED STATES POSTAL SERVICE

B

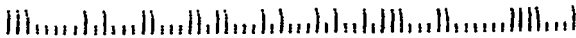
First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Martha Bosworth, Enforcement Coordinator  
U.S. Environmental Protection Agency  
New England  
1 Congress Street, Suite 1100 (HBS)  
Boston MA 02203-2023

HBS

0052-0320





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
EPA NEW ENGLAND  
1 CONGRESS STREET, SUITE 1100  
BOSTON, MA 02114-2023

Wells G & H  
11.9  
283452

**URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

August 16, 2005

William F. McGonigle  
Treasurer and Vice President - Finance  
Samuel Cabot Incorporated  
100 Hale Street  
Newburyport, MA 01950

Re: Supplemental Request for Information Pursuant to Section 104 of CERCLA in relation to the former Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, Massachusetts, hereinafter referred to as the "Site"

Dear Mr. McGonigle:

The United States Environmental Protection Agency (EPA) is investigating the source, extent and nature of the release or threatened release of any hazardous substance, pollutant or contaminant, or hazardous waste at the Whitney Barrel Company, 256 Salem Street, Woburn, Massachusetts, situated within the Wells G & H Superfund Site in Woburn, Massachusetts (the "Site"). This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to the Site and/or generated, treated, stored, or disposed of at the Site. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Site.

Specifically, EPA is seeking additional details regarding some of the information you provided in your, January 30, 2004, response to EPA's Section 104(e) Request For Information dated December 15, 2003. This letter requests your cooperation in providing information and documents to EPA clarifying your relationship to the Whitney Barrel Company and thereby your relationship to the Site.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request **within thirty (30) days** of your receipt of this letter, or to adequately justify

such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to thirty-two thousand five hundred dollars (\$32,500) for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also, be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq. Your response to this Information Request should be mailed to:

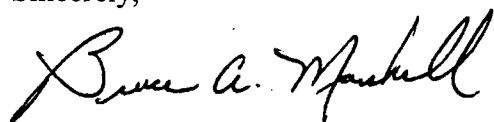
U.S. Environmental Protection Agency  
Martha Bosworth, Enforcement Coordinator  
Office of Site Remediation and Restoration (HBS)  
One Congress Street, Suite 1100  
Boston, MA 02114

ATTN: Wells G&H Case Team

If you have questions concerning the this Information Request, you may contact Martha Bosworth, Enforcement Coordinator at 617-918-1407. Technical questions concerning the Site should be referred to Joseph LeMay, the Remedial Project Manager at 617-918-1323. If you have legal questions, or if your attorney wishes to communicate with EPA on your behalf, please contact Susan Scott, Enforcement Counsel at (617) 918-1778.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, reading "Bruce A. Marshall". The signature is written in a cursive, flowing style.

Bruce A. Marshall, Chief  
Search and Cost Recovery Section, Technical & Support Branch  
Office of Site Remediation and Restoration  
Enclosures

**WELLS G & H SUPERFUND SITE  
SUPPLEMENTAL 104(E) QUESTIONS FOR  
SAMUEL CABOT, INC.**

**Period Being Investigated:** 1973 to 1978

Note: All questions refer to the period being investigated unless otherwise indicated.

**Information Request Definitions**

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et. seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear herein:

1. The terms "you," "your," "Samuel Cabot," and "Respondent" shall mean Samuel Cabot Inc., its officers, managers, employees, contractors, trustees, successors, and agents, and any predecessor, parent or successor corporations or companies.
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:
  - a. Writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
    - i. invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order;
    - ii. letter, correspondence, fax, telegram, telex;
    - iii. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
    - iv. agreement, contract, and the like;
    - v. log book, diary, calendar, desk pad, journal;
    - vi. bulletin, circular, form, pamphlet, statement;
    - vii. report, notice, analysis, notebook;
    - viii. graph or chart; or
    - ix. copy of any document.
  - b. Microfilm or other film record, photograph, or sound recording on any type of device;
  - c. Any tape, disc, or other type of memory generally associated with computers and data processing, together with:
    - i. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory;

- ii. printouts of such punch card, disc, or disc pack, tape or other type of memory; and
  - d. Attachments to or enclosures with any document as well as any document referred to in any other document.
3. The term “identify” means, with respect to a natural person, to set forth:
- a. The person’s full name;
  - b. Present or last known business and home addresses and telephone numbers;
  - c. Present or last known employer (include full name and address) with job title, position or business; and
  - d. The person’s social security number.
4. The term “identify” means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth:
- a. Its full name;
  - b. Complete street address;
  - c. Legal form (e.g., corporation, partnership, etc.);
  - d. The state under whose laws the entity was organized; and
  - e. A brief description of its business.
5. The term “identify” means, with respect to a document, to provide:
- a. Its customary business description (e.g., letter, invoice);
  - b. Its date;
  - c. Its number if any (e.g., invoice or purchase order number);
  - d. The identity of the author, addressor, addressee and/or recipient; and
  - e. A summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.
6. The terms “the period being investigated” and “the relevant time period” shall mean the period being investigated as specified on the first page of the Information Request Questions.
7. The term “the Site” shall mean and include the property on or about the 330 acres of land in Woburn, Massachusetts currently identified by the U.S. EPA as the Wells G & H Superfund Site.
8. The term “material” or “materials” shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
9. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products,



solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

10. The term "container" shall mean any metal or plastic vessel, including but not limited to, drums, barrels, tins, and tanks.
11. The term "Whitney Barrel" shall mean Whitney Barrel Co., Inc., its officers, managers, employees, trustees, successors, and agents, and any predecessor, parent, or successor corporations or companies.
12. The term "104(e) response" shall mean Samuel Cabot, Inc.'s response dated January 30, 2004 to the CERCLA 104(e) Information Request dated December 15, 2003.

### **INFORMATION REQUEST QUESTIONS**

#### **General Questions Regarding Respondent's Operations**

1. Identify any equipment that was removed during the dismantling of the Chelsea facility in 1979. For each piece of equipment removed, please describe the removal process, including:
  - a. The names of all contractors and/or companies who removed the equipment;
  - b. The names of all contractors and/or companies who cleaned the equipment prior to removal;
  - c. The waste(s) generated as a result of the equipment removal and cleaning processes;
  - d. Where these wastes were disposed of;
  - e. How the equipment was transported from the facility after removal; and
  - f. Where the equipment was taken after the dismantling.
2. Were any containers removed from the Chelsea facility as part of the facility closure process? Unless your response is an absolute "No," please provide:
  - a. The name of the company or individual who removed the containers;
  - b. The dates of each pickup;
  - c. The number of containers;
  - d. The type(s) of containers;
  - e. The size(s) of the containers;
  - f. The condition of each container;
  - g. The original and any subsequently added contents (i.e., bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to residues, of each container, including:
    - i. the name of each material;

- ii. the chemical composition of each material;
    - iii. the physical state of each material (e.g., solid, sludge, liquid);
    - iv. the volume of each material;
  - h. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
  - i. A description of how Respondent disposed of any emptied materials and/or rinse water; and
  - j. Any documentation or additional information related to these transactions.
3. Describe your handling and disposal practices for leaking and/or defective containers, including:
- a. How you handled and disposed of the leaking raw material and/or waste material;
  - b. The names of each contractor, company, and/or facility used to dispose of the leaking raw material and/or waste material;
  - c. The names of each contractor, company, and/or facility used to dispose of these defective containers; and
  - d. Please include any documentation or additional information related to these transactions.
4. In your 104(e) response, you provided a Coastal Services, Inc. Daily Job Report indicating that Coastal Services, Inc. “industrial” cleaned one of Samuel Cabot’s tanks to remove “sludge, oil and water for disposal.” Please describe Respondent’s procedures for tank cleaning and maintenance, including:
- a. Whether “industrial” cleaning of your tanks was a routine practice;
  - b. How often Respondent’s tanks were cleaned;
  - c. The names and street addresses of all contractors and/or companies who provided tank cleaning services to Samuel Cabot;
  - d. The location where the tanks were cleaned (i.e., at Respondent’s facility or sent to the outside contractor or company’s facility); and
  - e. How Respondent disposed of any materials removed from the tanks and/or rinse water.

**Information Concerning Respondent’s Association with Whitney Barrel**

- 1. Please identify each Samuel Cabot facility which had a relationship with Whitney Barrel.
- 2. For each shipment of used containers to Whitney Barrel, please provide:
  - a. The dates of each pickup and delivery;
  - b. The number of containers;
  - c. The type(s) of containers;
  - d. The size(s) of the containers;

- e. The condition of each container;
- f. The original and any subsequently added contents (i.e., bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
  - i. the name of each material;
  - ii. the chemical composition of each material;
  - iii. the physical state of each material (e.g., solid, sludge, liquid);
  - iv. the volume of each material;
- g. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- h. A description of how Respondent disposed of any emptied materials and/or rinse water; and
- i. Any documentation or additional information regarding these transactions.

**Information Concerning Respondent's Association with any other Drum Reconditioning and/or Recycling Companies**

1. State whether Samuel Cabot sent/delivered containers to any other drum reconditioning/recycling company, including but not limited to, Edward C. Whitney & Son, Inc. (also known as E. C. Whitney), Kingston Steel Drum/Great Lakes Container Corporation (now known as Mallinckrodt, Inc.), Kingsland Drum Company, Roche Brothers Barrel & Drum Co., Roy Brothers, Inc., Ryan Barrel Company, and Woburn Barrel.
2. For each of the above companies, please identify:
  - a. How frequently Respondent sent/delivered containers;
  - b. The original and any subsequently added contents (i.e., bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
    - i. the name of each material;
    - ii. the chemical composition of each material;
    - iii. the physical state of each material (e.g., solid, sludge, liquid);
    - iv. the volume of each material;
  - c. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
  - d. A description of how Respondent disposed of any emptied materials and/or rinse water;
  - e. The volume (i.e., number of containers, size of each container, and volume of waste associated with each container) of containers sent/delivered by Respondent;
  - f. The time period during which containers were sent/delivered by the Respondent;
  - g. All of the employees who transported containers from the Respondent's facility(ies); and
  - h. Provide any documentation or additional information related to these transactions.

### **Compliance with this Request**

Note: All questions in this section refer to the present time unless otherwise indicated.

1. Describe all sources reviewed or consulted in responding to this request and all individuals who have any knowledge of, or information about, the subject matter of any of the foregoing questions, including but not limited to:
  - a. The name of each individual;
  - b. The current job title and job description of each individual;
  - c. The job title and job description during the period being investigated of each individual;
  - d. Whether each individual is a current or past employee of Respondent;
  - e. A description of the types of information the individual possesses (i.e., specific information on company operations, wastes generated, and/or waste disposal practices);
  - f. The names of all divisions or offices of Respondent for which records were reviewed;
  - g. The nature of all documents reviewed;
  - h. The locations where those documents reviewed were kept prior to review; and
  - i. The location where those documents reviewed are currently kept.